

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARIA MARGHERITA PERACCHINO  
and MEDIAPRESS S.R.L.,

**NOTICE OF CROSS MOTION**

Plaintiffs,

07 Civ. 3257 (LTS)

-against-

VINCENZO MARRA and  
JOHN DOE COMPANY,

Defendants.

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**PLEASE TAKE NOTICE**, that upon Plaintiffs' Memorandum of Law in Support of Plaintiffs' Opposition to Defendants' Motion to Dismiss and in Support of Plaintiffs' Cross-Motion for Leave to Amend the Complaint, the (proposed) Second Amended Complaint, and upon the prior pleadings herein, Plaintiffs Maria Margherita Peracchino and MediaPress S.R.L., will move this Court before the Honorable Laura Taylor Swain, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on September 25, 2007 at 9:30 a.m., or as soon thereafter as counsel can be heard, for leave to amend the complaint pursuant to Federal Rule of Civil Procedure 15(a).

Counsel for Plaintiffs hereby declares that he used his best effort to resolve informally the matters in controversy with Defendants' counsel, by way of electronic mail and also via the telephone.

Dated: New York, New York  
August 16, 2007

WUERSCH & GERING LLP

By: 

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